

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RECORD OF COMMUNICATION

TO: Kelly Dahl, Legal Counsel for Pennfield FROM: Bill Gresham  
DATE: April 2, 1997 TIME: 0835  
SUBJECT: Pennfield Animal Health NOV Correspondence PHONE CALL

---

I called Mr. Dahl back to return his call from the previous day. He had called in order to clarify the intent of the March 19, 1997 letter from EPA to Pennfield. This letter indicated that, prior to August 1995, Pennfield was treating and/or disposing of laboratory hazardous waste by allowing it to evaporate. This letter went on to assert that, contrary to the proclamations of Pennfield and Mr. Dahl, the subject activity was in fact a violation of applicable regulation.

I stated to Mr. Dahl that the intention of this correspondence was to notify Pennfield that EPA contended that the Notice of Violation (NOV) issued was in fact appropriate. I further stated that, at some point in the future, Pennfield would be inspected again. Should there be no observation of the noted evaporation activities (and there should not be, as the practice was suspended in August of 1995), Pennfield would be in good shape. Should such activities be observed, Pennfield would be subject to penalty.

Mr. Dahl indicated that he had anticipated that this was the intent of the letter, and that he would notify representatives of Pennfield of this. No further action was anticipated.



R00109497  
RCRA RECORDS CENTER